

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE EASTERN DISTRICT OF TEXAS**

**TYLER DIVISION**

<b>WHETSTONE ELECTRONICS, LLC,</b>	§	
	§	
<b>Plaintiff,</b>	§	<b>Civil Action No. 6:10-cv-00278-JDL</b>
	§	
<b>v.</b>	§	
	§	
<b>XEROX CORPORATION., et al,</b>	§	<b>Jury Trial Demanded</b>
	§	
<b>Defendants.</b>	§	

**PLAINTIFF'S REPOSE TO DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT OF NONINFRINGEMENT WITH RESPECT TO THE  
CLAIM TERMS "COMPUTER," "INTERFACE CARD," AND "PRINTING DEVICE**

**"EXHIBIT A"**

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	§	
<b>Plaintiff,</b>	§	<b>Civil Action No. 6:10-cv-00278-JDL</b>
	§	
<b>v.</b>	§	
	§	
<b>XEROX CORPORATION, <i>et al.</i>,</b>	§	<b>Jury Trial Demanded</b>
	§	
<b>Defendants.</b>	§	

**DECLARATION OF ADAM G. PRICE**

I, Adam G. Price, declare as follows:

1. “My name is Adam G. Price. I am over 21 years of age, am of sound mind, and am competent to make this declaration. I am a partner at the law firm of DiNovo, Price, Ellwanger & Hardy, LLP (the “Firm”), counsel for Whetstone Electronics, LLC in this case. I make this declaration based upon my personal knowledge.

2. Attached to this declaration are true and correct excerpts from claim charts that were attached to Plaintiff’s Preliminary Infringement Contentions that were served on the Defendants (“Claim Charts”).

Exhibit No.	Accused Representative Product
A-1	Brother MFC-5490CN
A-2	Brother MFC-6490CW
A-3	Brother MFC-9120CN
A-4	Brother MFC-9440CN
A-5	Konica Minolta Bizhub C350


A-6	Lanier LD238C
A-7	Lanier LP126cn
A-8	Lanier LP226cn
A-9	Oki Data 610n
A-10	Oki Data 6050n and 6150n
A-11	Oki Data C3400
A-12	Oki Data C7350
A-13	Panasonic KX-MC6020
A-14	Ricoh Aficio 3245
A-15	Samsung CLP-610ND
A-16	Samsung CLX-3175FW
A-17	Samsung CLX-6200
A-18	Samsung CLS-6220
A-19	Savin CLP17
A-20	Savin CLP1036
A-21	Toshiba E-Studio 3511
A-22	Xerox 8142
A-23	Xerox 6128MFP
A-24	Xerox 6290MFP

3. The charts were prepared by the Firm based on documents and information that were publicly available at the time the charts were prepared. Specifically, the Claim Charts include screen shots and/or excerpts from larger documents, with the citation to that evidence below the particular screen shot and/or excerpt.

4. In preparing the Claim Charts, the Firm generally relied on the following documents and information relating to the representative accused products: information found on each of the Defendants' websites; information found on third-party websites relating to Defendants' products; and manuals and guides (including service manuals, technical manuals, installation guides, user guides and the like).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct."

Executed on June 22, 2011, in Austin, Texas.

  
Adam G. Price